

Law Offices of Sklar Smith-Sklar

1901 N. Olden Avenue, Suite 22

Ewing, NJ 08618

(609) 882-9800 Fax: (609) 538-1399

Keith D. Sklar, Esq.

Attorney for Debtor(s) George L. and Robin C. Kix

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In the Matter of:

George L. and Robin C. Kix

Debtor(s)

}
}
}
}
}
}

Case No. 17-14162 (MDC)
Chapter 13

MOTION TO REDUCE/MODIFY/EXPUNGE CLAIMS

Debtors, George L. and Robin C. Kix, by and through their attorney hereby files this Motion to Reduce claim 9-1 filed by PNC N.A. for the reasons set forth in the attached certification. Debtors seek an Order from this Honorable Court reducing claim 9-1.

Dated: February 12, 2019

/s/Keith D. Sklar, Esq.
Keith D. Sklar, Esq.
Attorney for Debtors

Law Offices of Sklar Smith-Sklar

1901 N. Olden Avenue, Suite 22

Ewing, NJ 08618

(609) 882-9800 Fax: (609) 538-1399

Keith D. Sklar, Esq.

Attorney for Debtor(s) George L. and Robin C. Kix

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In the Matter of:

George L. and Robin C. Kix

Debtor(s)

}
}
}
}
}
}

Case No. 17-14162 (MDC)
Chapter 13

**CERTIFICATION OF DEBTORS IN SUPPORT OF
NOTICE OF MOTION TO REDUCE/MODIFY/EXPUNGE CLAIMS**

George L. and Robin C. Kix, hereby depose and certify as follows:

1. We are the Debtors in the above captioned matter. We are making this Certification in support of the Motion to Reduce Claim No. 9-1 of PNC BANK, N.A..
2. We have reviewed the Claims Register with our attorney in this matter.
3. It appears from a review of the Claims Register that the Claim No. 9-1 filed by PNC Bank, N.A. should be reduced and/or modified.
4. On August 7, 2017, PNC Bank, N.A. filed a secured claim in the amount of \$28,847.27. This claim, however, is not consistent with the actual amount owed. We made our last payment to PNC Bank on September 30, 2015 and subsequently filed bankruptcies, the most recent of which is this case.
5. Our monthly payment to PNC Bank, N.A. is \$80.70/month. That means as the filing of this motion we have pre and post petition arrears totaling \$3,308.70 and not \$28,847.27 which is the total amount of the loan not arrears.
6. In light of the foregoing facts, PNC Bank, N.A.'s claim should be reduced to \$3,308.70.

We hereby certify that the foregoing statements made by us are true. We are aware that if any of the foregoing statements made by us are willfully false, we are subject to punishment.

Dated: February 12, 2019

/s/George L. Kix
George L. Kix, Debtor

Dated: February 12, 2019

/s/Robin C. Kix
Robin C. Kix, Debtor

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : Chapter 13
GEORGE AND ROBIN KIX, :
Debtor(s) : Case No.: 17-14162-MDC

ORDER

AND NOW this _____ day of _____, 2019 and for good cause having been shown, it is hereby **ORDERED** and **DECREED**:

That Debtors' Motion to Reduce claim 9-1 filed by PNC Bank, N.A. is hereby **GRANTED.**

IT IS FURTHER ORDERED that the Standing Chapter 13 Trustee shall pay PNC N.A. the sum of \$3,308.70 pro rata through the Debtor's Chapter 13 Plan.

MAGDELINE D. COLEMAN, U.S.B.J
EASTERN DISTRICT OF PENNSYLVANIA

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : Chapter 13
GEORGE AND ROBIN KIX, :
: :
Debtor(s) : Case No.: 17-14162-MDC

CERTIFICATE OF SERVICE

I, KEITH D. SKLAR, ESQUIRE, do solemnly affirm that I caused to be served on the party(ies) below and true and correct copy of this Motion and Proposed Order by either United States Mail, First Class in a pre-paid postage envelope or by the court's ECF system:

William C. Miller, Esq.
Standing Chapter 13 Trustee
1234 Market Street, 18th Floor
Philadelphia, PA 19107

PNC Bank, N.A.
PO BOX 94982
Cleveland, OH 44101
Attn: Judy Borkey

George and Robin Kix
5301 Downs Run
Pipersville, PA 18947

Creditor Matrix

Dated: 2/12/19

/s/ Keith D. Sklar, Esq.

Keith D. Sklar, Esq.

Attorney for Debtor, GEORGE AND ROBIN

KIX

Abington Emergeny Physician
56 W. Main Street STE 305
Newark, DE 19702

Ally Financial
Attn: Bankruptcy
Po Box 130424
Roseville, MN 55113

American Eagle GECRB
Ge Capital Retail Bank/Attention: Bankru
Po Box 103104
Roswell, GA 30076

Arcadia Recovery Bureau, LLC
PO Box 6768
Reading, PA 19610

Bk Of Amer
Po Box 982235
El Paso, TX 79998

Bloomington's/Bankruptcy Processing
PO Box 8053
Mason, OH 45040

Brown & Joseph
PO Box 59838
Schaumburg, IL 60159

Cap1/bontn
Po Box 30253
Salt Lake City, UT 84130

Cap1/bstby
P.O. Box 790441
Saint Louis, MO 63179

Cap1/bstby
Po Box 30253
Salt Lake City, UT 84130

Capital 1 Bank
Attn: General Correspondence
Po Box 30285
Salt Lake City, UT 84130

Capital Management Services, LP
698 1/2 South Ogden Street
Buffalo, NY 14206

Central Bucks Ambulance and Rescue Unit
PO Box 535
Baldwinsville, NY 13027

Chase
P.o. Box 15298
Wilmington, DE 19850

Chase - Toys R Us
Chase Card Svcs/Attn:Bankruptcy Dept
Po Box 15298
Wilmington, DE 19850

Citibank Sd, Na
Attn: Centralized Bankruptcy
Po Box 20363
Kansas City, MO 64195

Citibank Usa
Citicorp Credit Services/Attn:Centralize
Po Box 20507
Kansas City, MO 64195

Comenity Bank/bon Ton
3100 Easton Square Pl
Columbus, OH 43219

Comenity Bank/Limited Too
Attention: Bankruptcy
P.O. Box 182686
Columbus, OH 43218

Comenity Bank/pier 1
4590 E Broad St
Columbus, OH 43213

Comenity Bank/vctrssec
P.O. Box 182125
Columbus, OH 43218

Commercial Collection Corp. of NY
34 Seymour St
Tonawanda, NY 14150

Credit First, N.A
Bk13 Credit Operations
Po Box 81344
Cleveland, OH 44188

Credit First/CFNA
Bk13 Credit Operations
Po Box 818011
Cleveland, OH 44181

Discover Fin Svcs Llc
Po Box15316
Wilmington, DE 19850

Doylestown Emergency Assoc.
P.O. Box 826677
Philadelphia, PA 19182

Doylestown Emergency Associates PC
PO Box 3012
Wilmington, DE 19804

Doylestown Hospital
595 West State Street
Doylestown, PA 18901

Doylestown, Emergency Assoc. PC
PO Box 3012
Wilmington, DE 19804

Dsnb Bloomingdales
Macy's Bankruptcy Dept.
Po Box 8053
Mason, OH 45040

Dsnb Macys
Po Box 17759
Clearwater, FL 33762

Edward N. Flail, Jr., Esq.
10 Harrow Circle
Wayne, PA 19087

Fay Servicing
Attn: Bankruptcy Depart
440 S. LaSalle Street, STE. 2000
Chicago, IL 60605

Freedom Cu
626 Jacksonville Rd Ste
Warminster, PA 18974

GECRB/ Old Navy
Attention: GEMB
Po Box 103104
Roswell, GA 30076

GECRB/ PayPal Buyer credit
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076

GECRB/American Eagle
Attn:Bankruptcy
Po Box 103104
Roswell, GA 30076

GECRB/Care Credit
Attn: bankruptcy
Po Box 103104
Roswell, GA 30076

GECRB/Lens Crafters
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076

GECRB/Lowes
Attention: Bankruptcy Department
Po Box 103104
Roswell, GA 30076

Gemb/walmart
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076

Home Depot Credit Services
PO Box 790328
Saint Louis, MO 63179

Hsbc/Bon Ton
Attention: HSBC Retail Services
Po Box 5264
Carol Stream, IL 60197

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101

Kohls/capone
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051

Kohls/chase
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051

Marvic Supply Co., Inc
c/o Edward N. Flail, Jr
10 Harrow Circle
Wayne, PA 19087

Marvic Supply Company, iNc
4083 Swamp Road
PO Box 1290
Doylestown, PA 18901

NCB Management Services Incorporated
P.O. Box 1099
Langhorne, PA 19047

OLd Navy/GEGRB
PO Box 530942
Atlanta, GA 30353

Old Navy/Synchrony Bank
PO Box 530942
Atlanta, GA 30353

PA Dept of Transportation
Damage Recovery Unit
P.O. Box 2857
Harrisburg, PA 17105

Penndel-Middletown Emergency Squad
616 E Lincoln Hwy
Langhorne, PA 19047

Pennsylvania Department of Revenue
Bankruptcy Division
PO Box 280946
Harrisburg, PA 17128

PHysician Billing-PB CHop
Lock Box 8017
PO Box 8500
Philadelphia, PA 19178

Pnc Bank
Attn: Bankruptcy
2730 Liberty Ave
Pittsburgh, PA 15222

PNC Bank
PO Box 3180
Pittsburgh, PA 15222

Pnc Bank, N.a.
Po Box 3180
Pittsburgh, PA 15230

Point Pleasant-Plumsteadville EMS
Billing Office
PO Box 726
New Cumberland, PA 17070

Prsm/cbna
Po Box 6497
Sioux Falls, SD 57117

R"US Credit Cards/GECRB
P.O. Box 965016
Orlando, FL 32896

Sears/cbna
Po Box 6282
Sioux Falls, SD 57117

Synco/toysrus
Po Box 965005
Orlando, FL 32896

Td Bank Usa/targetcred
Po Box 673
Minneapolis, MN 55440

Td Banknorth Maine
Td Bank/Attn: Bankruptcy
Po Box 1377
Lewiston, ME 04243

Trac/cbsd
Po Box 6500
Sioux Falls, SD 57117

Trico Lift
418 Southgate Court
Mickleton, NJ 08056

Valley National Bank
747 Chestnut Ridge Road-Suite 201
Spring Valley, NY 10977

VNB Loan Services, Inc.
PO Box 1015
Spring Valley, NY 10977

Wayne Bank
717 Main Street
Honesdale, PA 18431

Wehrung's Lumber and Home
7711 Easton Road
PO Box 550
Ottsville, PA 18942

Wellsfargo
8600 W 159th St Suite 11
Orland Park, IL 60462

Wffinance
8600 W 159th St Suite 11
Orland Park, IL 60462

Zale/cbsd
Attn.: Centralized Bankruptcy
Po Box 20363
Kansas City, MO 64195